

THE DOW CHEMICAL COMPANY

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Document Processing Desk (6(a)(2))
Office of Pesticides Programs (7504C)
Antimicrobials Division
U. S. Environmental Protection Agency
1921 Jefferson Davis Highway
Crystal Mall 2 - Room 266A
Arlington, VA 22202

Subject: **UCARCIDE™ P 200 Antimicrobial, EPA Registration No. 464-713**
ortho-phthalaldehyde - 6(a)(2) Information

Dear Sir/Madam:

Pursuant to Section 6(a)(2) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended, 7 U. S. C. Section 138d(a)(2), The Dow Chemical Company hereby submits the following study regarding ortho-phthalaldehyde:

Vol. 1: Cifone, M. (2002). *InVivo/In Vitro Unscheduled DNA Synthesis in Rat Primary Hepatocyte Cultures at Two Timepoints with a Dose Range Finding Assay with OPA*,
45901001 Covance Laboratories; Guideline OPPTS 870.5550; Project Study ID 021030; The Dow Chemical Company, 41 pages.

This study evaluated the potential for DNA damage by *ortho*-phthalaldehyde (OPA) or an active metabolite by measuring unscheduled DNA synthesis (UDS) induced *in vivo* in rat primary hepatocytes cultured *in vitro*. OPA was found to be inactive in the *in vivo/in vitro* assay for UDS in rat primary hepatocyte cultures at two time points.

I trust that you will find this submission to be in good order. Any questions or problems please do not hesitate to call.

Very truly yours,

Maureen Miksztal

Maureen Miksztal
Senior Registration Specialist

Enc. (3)

cc: M. Swindell